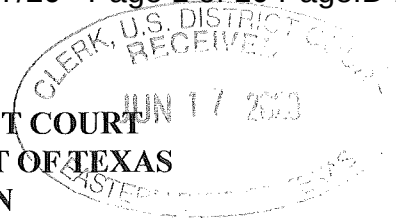


PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 05/2015)

IN THE UNITED STATES DISTRICT COURT
FOR THE _____ DISTRICT OF TEXAS

DIVISION



Donovan Meadows, ID.# 1826622

Plaintiff's Name and ID Number

H.H. Coffield Unit, 2661 F.M. 2054, Tenn. Colony, Tx.

Place of Confinement

CASE NO. 6:20CV323 JDK/JDL

(Clerk will assign the number)

v.

Lorie Davis, Director of TDCJ-CID, P.O. Box 99, Huntsville, Tx. 77342.

Defendant's Name and Address

Kenneth M. Putnam, H.H. Coffield Unit, 2661 F.M. 2054, Tenn. Colony, Tx. 75884.

Defendant's Name and Address

Pamela Pace, H.H. Coffield Unit, 2661 F.M. 2054, Tenn. Colony, Tx. 75884.

Defendant's Name and Address

(DO NOT USE "ET AL.")

INSTRUCTIONS - READ CAREFULLY

NOTICE:

Your complaint is subject to dismissal unless it conforms to these instructions and this form.

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACKSIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

FILING FEE AND IN FORMA PAUPERIS (IFP)

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$50.00 for a total fee of **\$400.00**.
2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at you prison unit.
3. The Prison Litigation Reform Act of 1995 (PLRA) provides "... if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or a initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from you inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$50.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)
4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

CHANGE OF ADDRESS

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "**NOTICE TO THE COURT OF CHANGE OF ADDRESS**" and shall not include any motion for any other relief. Failure to file a NOTICE OF THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

I. PREVIOUS LAWSUITS:

- A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment? ___ YES ☒ NO
- B. If your answer to "A" is "yes", describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)
 1. Approximate date of filing lawsuit: _____
 2. Parties to previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____
 3. Court: (If federal, name the district; if state, name the county.) _____
 4. Cause number: _____
 5. Name of judge to whom case was assigned: _____
 6. Disposition: (Was the case dismissed, appealed, still pending?) _____
 7. Approximate date of disposition: _____

- II. PLACE OF PRESENT CONFINEMENT: H.H. Coffield Unit, 2661 F.M. 2054, Tennessee Colony, Tx.
- III. EXHAUSTION OF GRIEVANCE PROCEDURES: ARE EXHIBITS, STATEMENT OF CLAIM
Have you exhausted all steps of the institutional grievance procedure? ✓ YES NO
Attach a copy of your final step of the grievance procedure with the response supplied by the institution.
SEE EXHIBITS:
- IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: Donovan Meadows, ID.#1826622, H.H. Coffield Unit,
2661 F.M. 2054, Tennessee Colony, Tx. 75884

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: Lorie Davis, Director of Texas Department of Criminal Justice -
-Corrections Institution Division (TDCJ-CID), P.O. Box 99, Huntsville, Tx. 77342.

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Legally responsible, overall operation of each institution under its jurisdiction, etc.

Defendant #2: Kenneth M. Putnam, head Warden of Coffield Unit, 2661 F.M. 2054,
Tennessee Colony, Tx. 75884.

Briefly describe the acts(s) or omission(s) of this defendant which you claimed harmed you.

Legally responsible, operation of Coffield Unit and welfare of all inmates/safety, etc.

Defendant #3: Allen Barker, head Chaplain of Coffield Unit, 2661 F.M. 2054, Tenne-
ssee Colony, Tx 75884.

Briefly describe the acts(s) or omission(s) of this defendant which you claimed harmed you.

Legally responsible, all operation on Coffield's religious programs/muslim function,
etc.

Defendant #4: John Doe, Regional Islamic Chaplain

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Legally responsible to uphold Islamic religious laws-programs/muslim functions, etc.

Defendant #5: John Doe, University of Texas Medical Branch (UTMB), 301 Univer-
sity Blvd 48, sub station, Galveston, Tx. 77555.

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Legally responsible, medical health care and health information for state
government document(s)/for the residence of Coffield Unit's inmates, etc.

(Continue IV., page #3)

Defendant #6: Pamela Pace, U.T.M.B. Medical Care Practice Manager at the Coffield Unit, 2661 F.M. 2054, Tennessee Colony, Texas 75884.

Briefly describe the act(s): Legally responsible for process of medical care and what kind of informations is allowed and provided to state government document(s), etc.

Defendant #7: John Doe, Northeast Texas Public Health District Regional Laboratory, 815 N. Broadway, Tyler, Texas 75702.

Briefly describe the act(s): Legally and contractually responsible for the different forms of testings to Coffield Unit's water and conceal test results from state government document(s), and Public interest, etc.

Defendant #8: John Doe, Texas Commission on Environmental Quality - Public Drinking water Section MC-155

Briefly describe the act(s): Legally responsible for overseeing quality drinking water for the entire State of Texas with it's U.S. Citizens, etc.

Defendant #9: John Doe, Director of Chaplaincy throughout TDCJ-CID, #2 Financial Plaze, suite 476,

Briefly describe the act(s): Legally responsible for all forms (Policies, Services) of operation to religious programs throughout TDCJ-CID, etc.

Defendant #10: John Doe, Assistant Director of Chaplaincy for TDCJ-CID, Region #11, #2 Backgate Road, Palestine, Texas 75803.

Briefly describe the act(s): Legally responsible for all forms (Policies, Services) of operation for religious programs encompassing the region where Coffield Unit is located, etc.

V. STATEMENT OF CLAIM: AND EXHAUSTION OF PROCEDURES ARE EXHIBITS :

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

- Questions of conditions of confinement with reasonable safety for non and pious prisoners / to imminent danger (OR) serious danger ?...*
- #1... *U.T.M.B. at unit administration are licensed to treat prisoners, however, said employees notices danger [pus] symptoms caused by unsafe water, knowingly will not test for Helicobacter pylori (H. pylori) / alter the cause with opinions, that will deprive the right treatments, causing more serious injuries; Is this an alter state government document (Health Record), ... to know the cause and danger ?*
- #2... *T.D.C.J.-C.I.D. administration knows unit's location at a toxic waste site said information is kept from prisoners and when questioning unsafe water : Coffield water is tested every month by independent laboratories... Than NOTICE Boil water is only to protect TDCJ-units and officials knows, prisoners cannot boil water / forces to drink unsafe water where said water test are conceal and alter and inmates with their families- public interest have no access to review said danger [pus] results, is malicious.*
- #3... *Unsafe Water in a condition of confinement is not reasonable, pious adress the condition of water in Halal / Kosher doctrines / TDCJ and Chaplaincy limited the pious, Islam religious authorities and IMAAMS are not allow its percent nor adress water, foods, kitchens, (OR) enter a contract with TDCJ and Chaplaincy / in a policy system that harm with malicious acts.*

VI. RELIEF: *See attach extra pages- what happen subsections →*

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Injunction / TDCJ & City officials- provid safe water & Records open to Public interest ; and Injunction / TDCJ-CID agencies enter an agreement with Islam Religious Authorities, and appropriate IMAAMS, adress Halal / Kosher and its policy system for pious [r] Court hold everybody liable for damages : Nominal, Compensatory, Punitive / other relief Court deems appropriate.

VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.

same - Donovan Darren LeVoy Meadows

B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

1826622

VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? ☐ YES ☒ NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): _____

2. Case number: _____

3. Approximate date sanctions were imposed: _____

4. Have the sanctions been lifted or otherwise satisfied? ☐ YES ☐ NO

(what happened?)

(Continue IV., page #4)

Lorie Davis, Director of the Texas Department of Criminal Justice - Correctional Institutions Division ("TDCJ-CID") is informed of the conditions of confinement at the H.H. Coffield Unit Administration has on going restrictions on water and plumbing ... NOTICE to Boil Water was a serious concern for prison population in dealing with unsafe water conditions clear-slimy, brown looking, odor-forms, etc., and inmates are the ones how treat said water without license by city officials; and all informations concealed.

John Doe, Director of U.T.M.B., and Unit Medical Practice Manager Pamela Pace, with regional doctor M.D. Wright have treated the unsafe water effects in the alleged Coffield Unit's history - a large part (in the hundreds) of prison population was affected with stomach issues and irritable bowel movements, etc.

Donovan Meadows, ID.#1826622,

1. On or about the years of 2018-2019, Offender Meadows requested through the Medical dept. of the Coffield Unit, a test be conducted to determine if he was positive for a bacterial infection showing signs of stomach and bowel issues.
2. In the year of 2018, thru the medical dept. of Coffield, blood and urine toxicology was conducted and results of this test confirmed presense of H-pylori.
3. In the same year, Meadows was prescribed a cycle of antibiotics, (refer to medical for medical order), to treat infection.

Cont.

5. In the same year after receiving results of the second test results Meadows was again prescribed another cycle of antibiotics, (minocycline) to treat existing infection.

1) At the present date of 6.09.2020, there has been no further attempt by medical dept. of Coffield to address, the existing issue of infection.

2) Request were made by Meadows several times to acquire records and dates of test conducted and their results thereof. At the present date of 6.09.2020, Meadows has been unsuccessful in obtaining such requested information.

3.) Meadows is an acting member of the Islamic Community of the Coffield Unit. It have had numerous issues with Coffield's dietary and kitchen management in regards to cross-contamination of pork products being served in the same area of pork free meat free serving areas.

Case 6:20-cv-00323-JDK-JD Document 1 Filed 06/17/20 Page 8 of 10 PageID #: 8
14) Meadows has attempted on numerous occasions to formally and informally resolve these issues with the Units Kitchen Captain, but has been unsuccessful in achieving any form of resolution. Grievances are rarely successful and are usually answered by units co-workers resulting in favorable responses.

15) In Sept of 2018, I filed and signed a sworn Affidavit to § 28 U.S.C. § 1746 pertaining to Halal dietary preparations. This document was submitted to chaplains department for review. There has been no response to such filings as of 6.9.2020.

I, Donovan Meadows, am an inmate of the Coffield Unit in Palestine, Tennessee Colony, TX.
I do swear by penalty of perjury that all allegations pertaining to this units medical department and its Food Service Management is factual and truthful.


Donovan Meadows

C. Has any court ever warned or notified you that sanctions could be imposed? _____ YES ☒ NO

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued.
(If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): _____
2. Case number: _____
3. Approximate date warning was issued: _____


Executed on: June 12, 2020
DATE


(Signature of Plaintiff)

PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 22nd day of June, 20 20.
(Day) (month) (year)


(Signature of Plaintiff)

WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.

State of Texas)

) Scilicet

County of Anderson)

AFFIDAVIT OF FACTS

"Indeed, no more than (affidavits) is necessary to make the prima facie case." United States. Kis, 658 F2d 526,536 (7th Cir. 1981); Cert. Denied., 50 U.S.L.W. 2169; S.Ct. March 22, 1982."

I, Donovan Meadows, a flesh and blood man of compos mentis, being duly sworn, depose and say, that I am personally familiar with the facts listed below, and regarding the same, I am able, willing and ready to testify under penalty of perjury, that said facts are true and correct to wit:

I, Donovan Meadows an offender of the Coffield Unit in Tennessee Colony, Palestine, TX, here do by swear under penalty of perjury, factually and presently by record of the Coffield Medical Dept, have twice tested positive of H-pylori, a bacteria present in the Coffield drinking water supply. Although I have completed a cycle of meds provided by the Coffield Medical Dept, for treatment of H-pylori, the source of this bacteria remains present in the drinking, therefore rendering offenders and myself to endure constant health issues. The water source is unhealthy and in its entirety un-pure and unfit for consumption.

I, Donovan Meadows, am over 18 years old, and personally familiar with the foregoing facts and state under penalty of perjury, said facts are true and correct.

/s/ Donovan Meadows
#1826622

Coffield Unit
2661 FM 2054
Tennessee Colony, Texas 75884